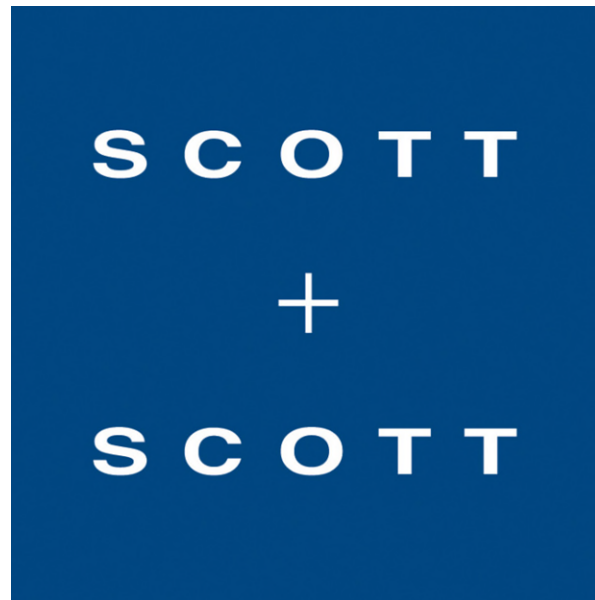


EXHIBIT A



FIRM RESUME

www.scott-scott.com



Scott+Scott specializes in the investigation and prosecution of complex actions across the globe – recovering billions for its clients. The Firm has extensive experience litigating securities fraud, antitrust, consumer and other complex cases, and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in the US, UK, and EU courts, offering a one-stop shop for international recoupment.





THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised of more than 135 team members, including more than 100 attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Virginia, Ohio, and Arizona. The Firm's European offices are currently located in London, Amsterdam, and Berlin.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.



CONSUMER PRACTICE GROUP

Scott+Scott's Consumer Practice Group consists of some of the premier advocates in the area of consumer protection and has litigated and secured some of the most significant consumer protection settlements on behalf of its clients, resulting in hundreds of millions of dollars to class members. The Firm's Consumer Practice Group has attorneys dedicated to three primary areas: Data Breach/Data Privacy Litigation, Insurance and Pharmaceutical Litigation, and Consumer Protection Litigation.

DATA BREACH/DATA PRIVACY

Scott+Scott has extensive experience litigating data privacy and data breach class actions, advancing cutting-edge legal theories. The Firm has achieved some of the largest recoveries in this area and currently serves in a leadership capacity in a number of data privacy and data breach class actions, including:

- *In re Equifax, Inc. Customer Data Sec. Breach Litig.*, No. 1:17-md-02800 (N.D. Ga.) (claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers; preliminary approval of settlement valued at \$32.5 million);
- *In re Google Assistant Privacy Litig.*, No. 5:19-cv-04286 (N.D. Cal.) (class action on behalf of consumers alleging privacy violations whereby Google Assistant records and discloses their private confidential communications without consent);
- *Lopez v. Apple Inc.*, No. 4:19-cv-04577 (N.D. Cal.) (class action on behalf of consumers and their minor children alleging privacy violations by Apple through its Siri application); and
- *In re: Am. Med. Collection Agency, Inc. Customer Data Sec. Breach Litig.*, No. 2:19-md-02904 (D.N.J.) (claims on behalf of consumers involving data breach of personal information).

Recently, in settling a class action against The Wendy's Co. involving a breach of personal and financial information, the court, in approving the \$50 million dollar settlement, noted that Scott+Scott and its attorneys demonstrated **"very significant experience in these types of class actions and in data breach litigation"** and that the attorneys **"brought to the table an incredible wealth of knowledge, was always prepared, really was thorough and professional in everything that was provided to the Court."** *First Choice Fed. Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506, Transcript at 32 (W.D. Pa. Nov. 6, 2019).



Additional data privacy and data breach settlements achieved by Scott+Scott for its clients include:

- *In re Arkansas Fed. Credit Union v. Hudson's Bay Co.*, No. 1:19-cv-4492 (S.D.N.Y.) (lead counsel, \$5.2 million settlement on behalf of consumers involving data breach of payment card information). In granting final approval of the settlement, the Court acknowledged that Scott+Scott's attorneys "have extensive experience in litigating data breach class actions in federal courts" and commended Scott+Scott for a "job well done."
- *The Home Depot, Inc., Customer Data Sec. Breach Litig.*, MDL No. 2583 (N.D. Ga.) (co-lead counsel; \$27.25 million settlement on behalf of financial institutions involving data breach and theft of the personal and financial information of over forty million credit and debit card holders);
- *In re Target Corp. Customer Data Sec. Breach Litig.*, MDL No. 2522 (D. Minn.) (\$59 million settlement on behalf of financial institutions injured by theft of sensitive payment card information);
- *Greater Chautauqua Fed. Credit Union v. Kmart Corp.*, No. 1:15-cv-02228 (N.D. Ill.) (settlement valued at \$13.4 million on behalf of financial institutions injured by the theft of sensitive payment card information); and
- *WinSouth Credit Union v. Mapco Express, Inc.*, No. 3:14-cv-01573 (M.D. Tenn.) (largest per dollar per card recovery involving payment card data breach brought on behalf of a class of financial institutions).



INSURANCE AND PHARMACEUTICAL

Scott+Scott represents consumers and health and welfare funds throughout the United States that have been overcharged in connection with their insurance and pharmaceutical transactions. The Firm currently serves in a leadership capacity in a number of insurance and pharmaceutical class actions, representing both consumers and third-party payors, including:

- *In re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Litig.*, MDL No. 3014 (E.D. Pa.) (representing a class of hospital systems as well as a class of third-party payors that paid for defective devices);
- *Kulwicki v. Aetna Life Ins. Co.*, No. 22-cv-0229 (D. Conn.) (class action alleging insureds were discriminated against under the Affordable Care Act);
- *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.) (class action on behalf of consumers and third-party union benefit funds alleging unlawful overcharges for medically necessary prescription drugs); and
- *County of Monmouth v. Rite Aid Corp.*, No. 20-cv-2024 (E.D. Pa.) and *Stafford v. Rite Aid Corp.*, No. 3:17-cv-01340 (S.D. Cal.) (companion class actions on behalf of consumers and third-party payors who were overcharged for prescription drugs).

The Firm's lawyers have obtained some of the largest settlements in consumer healthcare litigation, including:

- *In re Managed Care Litig.*, MDL No. 1334 (S.D. Fla.) (settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint providing monetary and injunctive benefits exceeding \$1 billion); and
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litig.*, MDL No. 2208 (D. Mass.) (\$40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts).



CONSUMER PROTECTION

Scott+Scott has been at the forefront in prosecuting consumer protection actions against organizations engaging in unfair practices. The Firm currently serves, or has recently served, in a leadership capacity in a number of consumer protection class actions, including:

- *Morris v. Apple, Inc.*, No. 5:20-cv-04812 (N.D. Cal.) (class action on behalf of consumers who purchased iTunes gift cards under false pretenses and were not refunded the value of the iTunes gift cards).
- *Aquilina v. Certain Underwriters at Lloyd's London*, No. 1:18-cv-00496 (D. Haw.) (representing Hawaii homeowners who were placed into insurance excluding lava coverage and suffered devastating losses as a result of the 2018 eruption of Kilauea);
- *The Vulcan Society, Inc. v. City of New York*, No. 1:07-cv-02067 (E.D.N.Y.) (\$100 million settlement and significant injunctive relief was obtained for a class of black applicants who sought to be New York City firefighters, but were denied or delayed employment due to racial discrimination);
- *In re Provident Fin. Corp. Credit Card Terms Litig.*, MDL No. 1301 (E.D. Pa.) (\$105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *In re Pre-Filled Propane Tank Mktg. & Sales Pracs. Litig.*, MDL No. 2086 (W.D. Mo.) (\$37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);
- *Murr v. Cap. One Bank (USA)*, N.A., No. 1:13-cv-01091 (E.D. Va.) (\$7.3 million settlement on behalf of class of consumers who were misled into accepting purportedly 0% interest credit card offers); and
- *Gunther v. Cap. One, N.A.*, No. 2:09-cv-02966 (E.D.N.Y.) (settlement resulting in class members receiving 100% of their damages in case alleging consumers were improperly charged undeliverable mail fees).



ACCOLADES

U.S. News & World Report “Best Law Firms”

The Firm is currently ranked by U.S. News & World Report as a “Best Law Firm” in commercial litigation in the New York region.

American Antitrust Institute

The 2018 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 settlement of 2018, as well as ranking the Firm #1 nationally for aggregate settlements: 2013-2018.

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year – Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and have thus far settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result and boost the number of women at all levels of a law firm.”^{1, 2} This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African-American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>

² <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.





WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.





ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.

ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, Amsterdam, London, Berlin, California, Connecticut, Virginia, Arizona, and Ohio.

In addition to managing the firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Cap. Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel



in *Red Lion Med. Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015- 2020, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015. In addition, Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers.

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, The Guardian, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.



JOSEPH P. GUGLIELMO

PRACTICE EMPHASIS

Joseph P. Guglielmo represents clients in consumer, antitrust and privacy litigation in federal and state courts throughout the United States.

ADMISSIONS

States of New York and Massachusetts; District of Columbia; United States Courts of Appeal: First, Second, Third, Sixth, Eighth, Ninth and Eleventh Circuits; United States District Courts: Southern, Eastern and Northern Districts of New York, Districts of Massachusetts, Connecticut, and Colorado, Northern District of Illinois, Eastern District of Wisconsin; United States Supreme Court

EDUCATION

Catholic University of America (J.D., 1995; B.A., *cum laude*, 1992; Certificate of Public Policy)

HIGHLIGHTS

Mr. Guglielmo is a partner in the firm's New York office and was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order seeking the recovery of over \$200 million from a Bernard Madoff feeder fund. Specifically, in approving the settlement, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo currently serves in a leadership capacity in a number of complex class actions, including: *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.) (lead counsel, asserting claims on behalf of nationwide class of consumers and third-party payers alleging overcharges for prescription drugs); *Stafford v. Rite Aid Corporation*, 3:18-cv-00152 (S.D. Cal.) (lead counsel, asserting claims that Rite Aid overcharged customers for prescription drugs); *In Re: Disposable Contact Lens Antitrust Litigation*, No. 3:15-md-2626 (M.D. Fla.)(co-lead counsel, settlements obtained in excess of \$45 million on behalf of a class of contact lens purchasers alleging violations of the antitrust laws); *Arkansas Federal Credit Union v. Hudson Bay*, No. 1:19-cv-4492-PKC (S.D.N.Y.) (lead counsel, claims on behalf of financial institutions arising out of data breach); *Sohmer v. UnitedHealth Group Inc.*, No. 18-cv-03191 (JNE/BRT) (D. Minn.) (co-lead counsel, claims on behalf of ERISA plan participants alleging overcharge for pharmaceutical copayments); *Negron v. Cigna Corporation*, No. 3:16-cv-1702 (WWE) (D. Conn.) (chair of executive committee, claims on behalf of ERISA plan participants involving overcharge of copayments for prescription drugs); *McPherson v. American Bank Systems*,



Inc., 5:20-cv-01307-G (W.D. Okla.) (co-lead counsel, claims involving disclosure of personal and financial information resulting from data breach); *In re Sonic Corp. Customer Data Security Breach Litig.*, 17-ml-2807 (N.D. Ohio) (Plaintiffs' Steering Committee, claims on behalf of financial institutions involving breach of payment card information); and *In re: American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, No. 19-md-2904 (D.N.J.), Plaintiffs' Steering Committee, claims on behalf of consumers involving data breach of personal information.

Mr. Guglielmo was recently a member of the settlement team and signatory of a \$92 million settlement in *In re TikTok, Inc., Consumer Privacy Litigation*, No. 1:20-cv-04699 (N.D. Ill.), involving violations of privacy claims on behalf of consumers. Mr. Guglielmo was also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789-LGS (S.D.N.Y.), where settlements in excess of \$2 billion have been obtained on behalf of purchasers of foreign exchange instruments who alleged violations of federal antitrust laws.

Throughout Mr. Guglielmo's career, he has achieved significant victories and obtained numerous settlements for his clients, including: *In re Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-02800 (N.D. Ga.) (claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers, preliminary approval of settlement valued at \$32.5 million); *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (\$27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders); *First Choice Federal Credit Union v. The Wendy's Company*, No. 16-cv-00506 (W.D. Pa.) (\$50 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 18.5 million credit and debit card holders); *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (\$59 million settlement on behalf of financial institutions injured by the theft of sensitive payment card information); *Veridian Credit Union v. Eddie Bauer LLC*, No. 2:17-CV-00356-JLR (W.D. Wash.) (\$9.8 million settlement on behalf of financial institutions arising out of data breach of payment card information); *Winsouth Credit Union v. Mapco Express Inc.*, No. 3:14-cv-1573 (M.D. Tenn.) (settlement of the largest dollar-per-card recovery on behalf of financial institutions involving data breach of credit and debit card information).

Mr. Guglielmo was one of the principals involved in the litigation and settlement of *In re Managed Care Litigation*, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding \$1 billion and played a leading role and obtained substantial recoveries for his clients including *Love v. Blue Cross and Blue Shield Ass'n*, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately \$130 million and injunctive benefits valued in excess of \$2 billion; *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1897 (D.N.J.), settlements in excess of \$180 million; *Valle v. Popular Community*



Bank, No. 653936/2012 (N.Y. Supreme Ct.), \$5.2 million settlement on behalf of consumers, *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of \$40 million; *Bassman v. Union Pacific Corp.*, No. 97-cv-02819 (N.D. Tex.), \$35.5 million securities class action settlement; *Garcia v. Carrion*, No. CV 11-1801 (D.P.R.), substantial corporate governance reforms; *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.), \$26 million securities class action settlement, *Murr v. Capital One Bank (USA)*, N.A., No. 13-cv-1091 (E.D. Va.), \$7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers, and *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.), \$6.1 million settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as “all-natural.” Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in *Hawaii Medical Association v. Hawaii Medical Service Association*, 113 Hawaii 77 (Haw. 2006), reversing the trial court’s dismissal and clarifying rights for consumers under the state’s unfair competition law.

Mr. Guglielmo lectures on electronic discovery and was a member of the Steering Committee of Working Group 1 of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property, and a member of the drafting team responsible for the *Sedona Principles, Third Edition*. Presently, Mr. Guglielmo serves on the board of the Advanced eDiscovery Institute at Georgetown University Law Center. He is a frequent speaker on electronic discovery issues. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to The National Law Journal’s “Plaintiffs’ Hot List.” In 2021, Mr. Guglielmo was recognized by Super Lawyers as a top Antitrust lawyer in the New York metro area, was named by Who’s Who in Legal Litigation: Leading Practitioner-E-Discovery (2021). Mr. Guglielmo was also named by Lawdragon in 2021 as one of the 500 Leading Plaintiff Financial Lawyers.

Mr. Guglielmo is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, and American Bar Association.



ERIN GREEN COMITE

PRACTICE EMPHASIS

Erin Green Comite litigates complex class actions throughout the United States, representing the rights of consumers, insureds, and other individuals harmed by corporate misrepresentation and malfeasance.

ADMISSIONS

State of Connecticut; United States Courts of Appeal: Second, Third, Ninth, and Eleventh Circuits; United States District Courts: All Districts of New York, District of Connecticut, Northern District of Illinois, Eastern District of Wisconsin, District of Maryland, and District of Colorado

EDUCATION

University of Washington School of Law (J.D., 2002); Dartmouth College (B.A., *magna cum laude*, 1994)

HIGHLIGHTS

Ms. Comite is a partner in the firm's Connecticut office and Co-Chair of the firm's Consumer Practice Group. She frequently serves in a leadership role in complex class actions. For example, she was appointed as Co-Lead Counsel in a major data breach case on behalf of financial institutions, *First Choice Federal Credit Union v. The Wendy's Co.*, No. 16-cv-00506 (W.D. Pa.) (\$50 million settlement), is appointed as Co-Lead Counsel in two cases pending against sellers of baby food that contains elevated levels of heavy metals, *Wilson v. Walmart, Inc.*, No. 3:21-cv-00082-DPM (E.D. Ark.) and *In re Beech-Nut Nutrition Company Baby Food Litig.*, No. 1:21-cv-00133-DNH (N.D.N.Y.), and is appointed to the Executive Committee in *In re Robinhood Outage Litig.*, No. 3:20-cv-01626-JD (N.D. Cal.). She also currently is litigating deceptive trade practices claims against Walgreen Co. and Rite Aid Corp. on behalf of consumers allegedly overcharged for generic prescription drugs, *Forth v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.) and *Stafford v. Rite Aid Corp.*, No. 3:17-cv-01340 (S.D. Cal.), and privacy claims against Google, Inc. and Apple, Inc. on behalf of owners of allegedly eavesdropping Google Assistant and Siri enabled devices, *In re Google Assistant Privacy Litig.*, No. 5:19-cv-04286 (N.D. Cal.) and *Lopez v. Apple Inc.*, No. 4:19-cv-04577 (N.D. Cal.).

Ms. Comite has played a significant role in the prosecution of numerous other consumer class action cases such as: *In re Equifax, Inc. Customer Data Security Breach Litig.*, MDL No. 2800 (N.D. Ga.), Scott+Scott Court-Appointed Co-Lead Counsel, Ms. Comite Law & Briefing Committee Chair (settlement valued at \$35.2 million); *In re The Home Depot, Inc., Customer Data Security Breach Litig.*, MDL No. 2583 (N.D. Ga.), Scott+Scott Court-Appointed Co-Lead Counsel, Ms. Comite Law & Briefing Committee



member (\$27.25 million settlement); *In re Target Corporation Customer Data Security Breach Litig.*, MDL No. 2522 (D. Minn.), Scott+Scott Plaintiffs' Steering Committee member, Ms. Comite Discovery Committee member (\$59 million settlement); *Veridian Credit Union v. Eddie Bauer LLC*, No. 2:17-cv-00356 (W.D. Wa.) (settlement valued at \$9.8 million); *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-02228 (N.D. Ill.), Chair of the Plaintiffs' Steering Committee (\$8.1 million settlement); *Morrow v. Ann, Inc.*, No. 1:16-cv-03340 (S.D.N.Y.) (\$8.1 million settlement); *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) (\$7.3 million settlement); *Arkansas Federal Credit Union v. Hudson's Bay Co.*, No. 19-cv-4492 (S.D.N.Y.) (\$5.1 settlement); *Luca v. Wyndham Worldwide Corp.*, No. 2:16-cv-00746 (W.D. Pa.) (\$7.6 settlement); *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) (\$6.1 settlement); *Valle v. Popular Community Bank*, No. 653936/2012 (N.Y. Supreme Ct.) (\$5.2 million settlement); and *In re Nutella Mktg. & Sales Practices Litigation*, No. 11-cv-01086 (D.N.J.) (\$2.5 million settlement).

Courts have recognized Ms. Comite's professionalism and competence. As court-appointed co-lead counsel in *First Choice Federal Credit Union v. The Wendy's Co.*, No. 16-cv-00506 (W.D. Pa.), Ms. Comite represented a class of financial institutions that incurred losses arising out of a data breach and achieved a \$50 million settlement – one of the largest data breach settlements reached on behalf of financial institutions. In granting final approval to the settlement, U.S. Magistrate Judge Maureen Kelly commended Ms. Comite and her co-counsel, stating: "it's apparent to the Court that there was substantial and significant high-level work performed by counsel for the plaintiffs" and "as involved as this case was, if every case I had was as well-organized and professionally presented as this case has been, my life would be much easier." *Wendy's*, ECF No. 194, Nov. 6, 2019, Hrg. Tr. at 27-28, 32.

While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In *Hohider v. United Parcel Service, Inc.*, Ms. Comite spearheaded a nearly year-long investigation into every facet of UPS's preservation methods, requiring intensive, full-time efforts by a team of attorneys and paralegals well beyond that required in the normal course of pre-trial litigation. Ms. Comite assisted in devising the plan of investigation in weekly conference calls with the Special Master, coordinated the review of over 30,000 documents that uncovered a blatant trail of deception and prepared dozens of briefs to describe the spoliation and its ramifications on the case to the Special Master. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the Court conditioned the parties' settlement of the three individual ADA cases on UPS adopting and implementing preservation practices that passed the approval of the Special Master.

Ms. Comite's appellate victories in consumer class actions include *Nunes v. Saks Inc.*, 771 F. App'x 401 (9th Cir. May 30, 2019) (oral argument and on brief); *Chavez v. Nestle USA, Inc.*, 511 F. App'x 606



(9th Cir. 2013) (on brief) (achieving a reversal of dismissal); and *In re Nutella Mktg. & Sales Practices Litig.*, 589 F. App'x 53 (3d Cir. 2014) (on brief) (defending settlement from professional objectors).

Prior to entering law school, Ms. Comite served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.

In addition, Ms. Comite supports Connecticut Children's Medical Center, Special Olympics, and the American Heart Association.



CAREY ALEXANDER

PRACTICE EMPHASIS

Mr. Alexander is a partner in the Firm's New York office in the Consumer Practice Group.

ADMISSIONS

Admitted to practice in the State of New York, New York's Southern, Eastern, and Western Districts, the Northern District of Illinois, the Eastern District of Wisconsin, the District of Colorado, the District of Connecticut, and the Courts of Appeals for the Third and Ninth Circuits.

EDUCATION

St. John's University School of Law (J.D., *magna cum laude*, 2012); Skidmore College (B.A., 2004)

HIGHLIGHTS

Carey Alexander's practice spans the breadth of consumer protection litigation, focusing primarily on claims involving deceptive pricing, data privacy, and pharmaceutical fraud. He serves as part of the appointed leadership steering numerous class actions representing consumers and financial institutions in state and federal courts throughout the United States.

Mr. Alexander has been recognized for his efforts on behalf of the classes he has represented. Judge Castel of New York's Southern District of New York recently commended Mr. Alexander and his colleagues for their "extensive experience in litigating data breach class actions in federal courts."

In his spare time, Mr. Alexander serves as an appointed member of the New York City Bar Association's Consumer Affairs Committee and as a volunteer Arbitrator in New York City's Small Claims Court. He has been recognized on the Super Lawyers New York Metro Rising Stars list every year since 2016.

Prior to joining Scott+Scott, Mr. Alexander worked as an associate in the New York office of a national class action litigation firm. During law school, Mr. Alexander served as an editor of the St. John's Law Review. His note, *Abusive: Dodd-Frank Section 1031 and the Continuing Struggle to Protect Consumers*, 85 St. John's L. Rev. 1105 (2012), has been cited in judicial opinions and in several legal journals, including the Harvard Law Review. Before joining the bar, Mr. Alexander served as an editor of the widely acclaimed consumer-advocacy blog The Consumerist. He also served as a policy advisor to the Bronx Borough President, worked as part of the National Campaign to Restore Civil Rights, and participated in the Fellowship for Emerging Leaders in Public Service at NYU's Robert F. Wagner Graduate School of Public Service.

REPRESENTATIVE CASES



- *In re Equifax, Inc., Customer Data Security Breach Litig.*, No. 1:17-md-2800 (N.D. Ga.) (settlement valued at \$35.2 million);
- *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-506 (W.D. Pa.) (settlement valued at \$50 million);
- *Morrow v. Ann Inc.*, No. 1:16-cv-3340 (S.D.N.Y.) (settlement valued at \$7.6 million);
- *Luca v. Wyndham Worldwide Corp.*, No. 2:16-cv-00746 (W.D. Pa.) (settlement valued at \$7.6 settlement); and
- *Ark. Fed. Credit Union v. Hudson's Bay Co.*, No. 1:19-cv-04492-PKC (S.D.N.Y.) (settlement valued at \$5.1 million).



ANJA RUSI

PRACTICE EMPHASIS

Ms. Rusi's practice focuses on complex consumer class actions with a focus on deceptive pricing and data breach litigation. She also represents governmental entities who are bringing actions against pharmaceutical manufacturers and distributors in opioid litigation, other than in Connecticut.

Ms. Rusi also represents clients in various Connecticut state court matters including negligence, contractual disputes, and probate administration.

ADMISSIONS

State of Connecticut; United States District Court for the District of Connecticut

EDUCATION

Western New England School of Law (J.D., 2016) Fairfield University (B.A., 2013)

HIGHLIGHTS

Ms. Rusi is an associate in the firm's Connecticut office. Prior to joining the firm, Ms. Rusi worked for a mid-sized firm in Hartford representing clients in a broad range of areas including contract and commercial litigation, real estate litigation, and insurance law.

Ms. Rusi practices in varied Connecticut state court matters as well as federal class actions and has been recognized as a "Rising Star" by Connecticut Super Lawyers (2019-2021).



ETHAN S. BINDER

BIO

Mr. Binder is an associate in the firm's New York office, specializing in consumer litigation and class actions in both federal and state courts.

While in law school, Mr. Binder was the Executive Editor of the Moot Court Association and a member of the Trial Competition Team.

Prior to joining Scott+Scott, Mr. Binder served as an Assistant District Attorney in the Economic Crimes Bureau of the Bronx County District Attorney's Office, where he gained extensive experience investigating and prosecuting felonies involving high-value larcenies, schemes to defraud the public/government, and identity theft.

EDUCATION

New York Law School (J.D., 2019); State University of New York at Binghamton (B.A., Philosophy, Politics, & Law; Psychology, 2015)

ADMISSIONS

States of New York and New Jersey; United States District Courts: District of New Jersey; Southern and Eastern Districts of New York (Pending)

ASSOCIATIONS

New York City Bar Association, Government Ethics & State Affairs Committee, Member



AMANDA M. ROLON

PRACTICE EMPHASIS

Amanda Marie Rolon is a member of the consumer class actions group where she advocates for consumers who have been wronged by deceptive and unfair business practices.

ADMISSIONS

State of New York; United States District Courts: Southern and Eastern Districts of New York

EDUCATION

University of Iowa College of Law (J.D. 2019); Hunter College (B.A., English Literature, Language, and Criticism, Distinguished Honors, 2014)

HIGHLIGHTS

Amanda Marie Rolon is a Litigation Associate in the New York Office.

Prior to joining Scott+Scott, Ms. Rolon was an Assistant Corporation Counsel with the Special Federal Litigation Division of the New York City Law Department where she defended the City of New York and its law enforcement officials in federal actions primarily alleging Section 1983 constitutional and civil rights violations.

